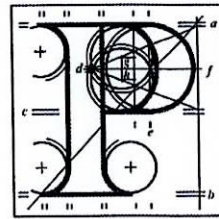


**Our Case Number:** ABP-316272-23

**Planning Authority Reference Number:**



**An  
Bord  
Pleanála**

Residents of Mountpleasant Area  
c/o Claudia Strauss  
7 Mount Pleasant Avenue Upper  
Dublin 6  
D06 H308

**Date:** 16 August 2023

**Re:** Bus Connects Templeogue/Rathfarnham to City Centre Core Bus Corridor Scheme  
Templeogue/Rathfarnham to City Centre

Dear Sir / Madam,

An Bord Pleanála has received your recent submission in relation to the above-mentioned proposed road development and will take it into consideration in its determination of the matter. Please accept this letter as a receipt for the fee of €50 that you have paid.

Please note that the proposed road development shall not be carried out unless the Board has approved it or approved it with modifications.

The Board has also received an application for confirmation of a compulsory purchase order which relates to this proposed road development. The Board has absolute discretion to hold an oral hearing in respect of any application before it, in accordance with section 218 of the Planning and Development Act 2000, as amended. Accordingly, the Board will inform you in due course on this matter. The Board shall also make a decision on both applications at the same time.

If you have any queries in relation to this matter please contact the undersigned officer of the Board at [laps@pleanala.ie](mailto:laps@pleanala.ie)

Please quote the above-mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

Eimear Reilly  
Executive Officer  
Direct Line: 01-8737184

HA02A

Teil	Tel	(01) 858 8100
Glao Áitiúil	LoCall	1890 275 175
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Láithreán Gréasáin	Website	<a href="http://www.pleanala.ie">www.pleanala.ie</a>
Ríomhphost	Email	<a href="mailto:bord@pleanala.ie">bord@pleanala.ie</a>

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

Residents of Mountpleasant area including Mountpleasant Avenue Upper, Gulistan Terrace, Gulistan Cottages, Gulistan Place, Richmond Place, Rugby Road, Swan Grove and Mountpleasant Square  
c/o Claudia Strauss  
7 Mount Pleasant Avenue Upper  
D06 H308 Dublin

An Bord Pleanála  
Strategic Infrastructure Division  
64 Marlborough Street  
Dublin 1  
D01 V902

Dublin, 11 August 2023

**Planning Reference: REF NO ABP No 316272-23**  
**Observations in relation to TEMPLEOGUE / RATHFARNHAM TO CITY CENTRE CORE BUS CORRIDOR SCHEME – Focus Rathmines Road Lower and adjoining area**

To whom it may concern:

As a collective of 47 residents of the Mountpleasant area (full names and addresses provided below), we have reviewed the BusConnects plan for the Rathfarnham to City Centre route and wish to make the following observations.

We broadly support the BusConnects proposal, including the Rathmines BusGate. We particularly welcome the filtered permeability proposal on Mountpleasant Avenue Lower as critical to ensure that Mountpleasant Avenue does not become the default through-road for traffic diverted from Rathmines Road.

However, we ask An Bord Pleanála that the plans are approved with the condition that the proposed re-introduction of a vehicular right-turn from Richmond Hill into Mountpleasant Avenue Upper is not implemented as it will further endanger pedestrians in particular, but also cyclists in favour of the minor convenience of vehicular traffic. The needs of pedestrians in particular but also those of cyclists have not been taken into account when proposing this retrograde measure.

We are outlining below the reasons why the proposed traffic light shuttle system is not suitable to safely manage traffic movements on this narrow road with sub-standard footpaths and why we are opposing this proposed measure:

- 1) **The proposed shuttle system will result in vehicles mounting footpaths due to the road's dimensions, as was the case prior to the implementation of the no-entry for vehicles into Mountpleasant Avenue Upper. This illegal behavior will endanger pedestrian safety.**
- 2) **The proposed shuttle system is not fit for purpose to safely manage traffic movements as it does not comply with the minimum requirement for pedestrian infrastructure and the provision of an accessible and inclusive road design. It is inconsistent with the stated objectives and design principles of the NIFTI Intervention Hierarchy and NIFTI Model Hierarchy.**

- 3) **The proposed shuttle system will compromise cyclist safety.**
- 4) **Inconsistent, incomplete and misleading information provided to the public limits the ability of key stakeholders to participate in the mandatory consultation in an informed manner.**

It is noted that a vehicular right turn into Mountpleasant Avenue Upper is not needed to allow general traffic to turn off Rathmines Road (via a right turn) before reaching the BusGate. The proposed reversal of the existing one-way traffic regime on Williams Park, will facilitate vehicular traffic turn off (via a left turn) before the BusGate and return to Rathmines Road via Military Road and Williams Park without crossing the carriageway.

**Rational for opposing the re-introduction of the right-turn into Mountpleasant Avenue Upper:**

**1. The proposed shuttle system will result in mounting footpaths, illegal behavior that endangers pedestrian safety**

The existing no-entry for vehicles from Richmond Hill/Mountpleasant Avenue Lower into Mountpleasant Avenue was successfully implemented in 2019 following a thorough assessment by Dublin City Traffic Engineers, consultation with residents and involvement of local councillors. This measure was required as the road is too narrow in a number of sections to allow cars to pass each other without mounting footpaths.

Due to the dimensions of the carriageway, the proposed shuttle system will not allow cars to pass each other at the proposed location for the shuttle system, where the width of the carriage way measures just 4.3m. We note that the proposed plans did not include any measurements of the carriage way and / or footpaths.

The Preliminary Design Guidance Booklet for BusConnects Core Bus Corridors references the required carriageway width for local streets with a share surface carriage way as 4.8m. While the proposed traffic light shuttle system is intended to safely manage traffic movements at the entrance from Richmond Hill into Mountpleasant Avenue Upper where the carriage way is very narrow, similar pinchpoints exist elsewhere on Mountpleasant Avenue Upper, where cars cannot safely pass each other without mounting footpaths. The proposed shuttle system does not adequately consider the impact of the cars entering Mountpleasant Avenue Upper from Richmond Hill further along the road. At present, the issue of cars mounting footpaths has been reduced following the introduction of the no-entry from Richmond Hill. The proposed increase in bi-directional traffic flow will adversely affect the full length of the road to an unacceptable degree, which has not been taken into consideration by the proposal.

We have included in our submission relevant measurements as well as photographic evidence showing the practice of cars driving on the footpath to pass each other prior to the implementation of the present traffic management system (no entry from Richmond Hill / Mountpleasant Avenue Lower).

**We trust that An Bord Pleanála would not support a proposal that requires cars to drive on footpaths, and as such, will not approve this proposal.**

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**2. The proposed shuttle system is not fit for purpose to safely manage traffic movements as it does not comply with the minimum requirement for pedestrian infrastructure and the provision of an accessible and inclusive road design. It is inconsistent with the stated objectives and design principles of the NIFTI Intervention Hierarchy and NIFTI Model Hierarchy**

The pavement treatment Treatment Plan 3.06 sheet 30 for Mountpleasant Avenue Upper does not propose pavement widening to the required minimum recommended footpaths width, i.e. the proposed plan does not comply with the stated objective of the BusConnects Plan (Preliminary Design Guidance Booklet for BusConnects Core Bus Corridors) and its stated objective to be compliant with the Design Manual for Urban Roads and Streets (DMURS). The BusConnects Design Guidance references 2.0m as the desirable minimum width for a pedestrian footpath as per the DMURS, with an absolute minimum defined as 1.8m with permitted localised deviations only. According to the plans, the shuttle system traffic lights (#3 and #5) are proposed for installation on footpaths measuring <0.9m and c.1.0m wide respectively.

While Mountpleasant Avenue Upper has always been an important through-route for pedestrians & cyclists, the introduction of the no-entry in 2019 has resulted in a welcome further growing volumes of cyclists and pedestrians now using the road. Any increase in bi-directional traffic flow would require enhanced pedestrian safety measures to be implemented on other locations of the road where the width of footpath are substandard and non-compliant with DMURS, most notably close to the busy junction near Belgrave Square.

The proposal does not pay any regard to necessary pedestrian crossings.

No disability audit has been undertaken for the proposed measures on Mountpleasant Avenue Upper. Designing for people with disabilities will be of particular relevance here as the nearby Gulistan Development will include a substantial element of senior housing.

Given that the proposal does not appear to address the sub-standard footpath width and the risk of cars mounting footpaths, we believe that the proposal is at odds with the stated objective of the NTA to “take full account of disabled people and pedestrians which mobility impairments when delivering transport schemes which affect the pedestrian environment and will implement improvements to existing facilities where appropriate and encourage the enforcement of the Road Traffic Laws in this regard”.

As the current safety of pedestrians and cyclists appears to be deteriorating as a result of the proposal, the proposed measure contradicts the stated NIFTI intervention Hierarchy of

- 1: Maintain
- 2: Optimise
- 3: Improve.

The proposed design removes the existing contraflow cycle lane and does not make any proposed enhancement to the existing poor pedestrian infrastructure which would need to be addressed ahead of facilitating two-way traffic back to this road.

While we understand that the delivery of a large infrastructure programme such as BusConnects requires compromises, the user hierarchy still stands as:

- 1 Active travel
- 2 Public Transport
- 3 Private Vehicles

The implementation of the proposal for Mountpleasant Avenue is neither required nor justified as an enabler for the rest of BusConnects, but rather a proposal designed to favour private vehicles in what is a strategically important location for active travel.

The road is heavily used by pedestrians to access schools, shops and public transport in Rathmines and Ranelagh. The pedestrian access route from Mountpleasant Square traversing Mountpleasant Avenue toward Richmond Hill, is a key access point for the Luas stop at Ranelagh which is only minutes' walk away from this location. This route is also a key access route for children accessing the nearby St Mary's school and RMDS school by bike or on foot.

Pedestrian traffic is expected to increase, with the new development on the Gulistan depot site, designed to provide local permeability improvements via Gulistan Terrace and Mountpleasant Avenue Upper. As outlined further below, the road is a key component of the GDCNP and as a traffic calmed route could become a safe cycle route connecting Mountpleasant Avenue and the Canal Greenway. While the road has strategic importance for pedestrian and cycle flows, it is not critical to facilitate car traffic.

In particular if a right-hand turn was facilitated from Castlewood onto Rathmines Road, this road could become access only without impacts on traffic flows. The current proposed traffic flows in the BusConnects plans encourages the use of Mountpleasant Avenue Upper as the main east-west / west-east corridor for vehicular traffic via Leinster Road, Rathmines Road, Richmond Hill and Mountpleasant Avenue Upper.

**We trust that An Bord Pleanála would not support a proposal that is non-compliant with minimum standards, guidelines and objectives.**

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### **3. The proposed shuttle system will compromise cyclist safety.**

Mountpleasant Avenue Upper is heavily used by cyclists of all abilities. Cyclist numbers have significantly increased since the introduction of the contraflow cycle lane and the no-entry for vehicular traffic from Richmond Hill / Mountpleasant Avenue Lower. We are therefore concerned about the impact the proposed removal of the contraflow lane and re-introduction of bi-directional traffic flows on this road will have on cyclists.

The revised Great Dublin Area Cycle Network Plan (DACNP) 2022 (as adopted in January 2023) identifies Mountpleasant Avenue Upper and Lower as a 'Secondary Route'. Secondary Routes provide a vital link between primary cycle routes and local zones. Mountpleasant Square South and Richmond Hill are marked as 'Feeder Routes' providing important connections from zones to the network levels above.

Providing a suitable alternative to the cycle lane on Rathmines Road for less confident cyclists and families remains vital as an alternative to the busy town centre of Rathmines Road, where conflict

between cyclists and other road users cannot be avoided, e.g. along bus stops and delivery bays. The BusConnects design proposal also states that the minimum recommended cycle path width of 2m cannot be provided along the full length of Rathmines Road, which requires designers to consider the provision of additional complementary cycle facilities on an alternative route.

A recent engagement between a DCC traffic engineer and residents onsite on 20<sup>th</sup> October 2022 explored potential changes to the current on-street parking arrangements. The engineer advised that having cars parked directly outside the houses numbered 53-59 (i.e. the location where cars would need to await at the proposed traffic light) could not be supported as this would impact the safety of cyclists which could no longer be overtaken in a safe manner. As such, the current proposal for increased bidirectional vehicular traffic will put cyclist safety at risk from close passing of cyclists as outlined by DCC's traffic engineer.

**We suggest that An Bord Pleanála reject the proposal for Mountpleasant Avenue Upper as one in conflict with the planned with the objectives of the GDACNP.**

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#### **4. Inconsistent, incomplete and misleading provision of information to the general public**

We also note that this proposal has been introduced late into the process. This limits the ability of key stakeholders to familiarise themselves with the proposal, and to participate in the mandatory process in an informed manner, in particular since no further public information events are being held and since the information provided is somewhat misleading and incomplete with regard to this particular proposal.

The maps provided in the submission did not include an aerial view of Mountpleasant Avenue Upper showing the dimensions of the road, which makes an assessment by An Bord Pleanála and the public of the appropriateness of this proposal difficult: the small dimension of the road and sub-standard footpath widths being key reasons why planning approval for this proposal should be refused.

The references to the proposed changes to the traffic management on Mountpleasant Avenue Upper are inconsistent and misleading, further undermining the mandatory public consultation process in respect to this part of the proposal.

- An accurate description of the proposal is provided in paragraph 4.5.4.1 and sheet 27 of section 3.03 General arrangement: "It is also proposed to reintroduce the right turn from Richmond Hill to Mountpleasant Avenue Upper, to facilitate general traffic to turn off of the Proposed Scheme main corridor at Richmond Hill in advance of the Bus Gate and return via Mountpleasant Avenue Upper. Due to the restricted road width at this location, a traffic light shuttle system is proposed to safely manage these traffic movements."
- There is no reference to the removal of the existing contraflow cycle lane. No details are provided on how cycle or pedestrian traffic will be managed.
- In section 4.5.4.10 Table 4.27 under the location heading of "Mountpleasant Avenue Lower North of junction with Richmond Hill" there are a number of incorrect statements which are misleading to both An Bord Pleanála and the public and suggest a lack of understanding of the current situation by BusConnects. These are:
  - The existing situation is described as one where "currently vehicles can turn from Mountpleasant Avenue Lower onto Richmond Hill and similarly can from Richmond Hill onto Mountpleasant Avenue Upper". This is incorrect.

- The wording of the proposed change reads as follows: “As part of the proposed scheme, it is proposed to install a model filter on Mountpleasant Avenue Upper. This is incorrect: the model filter is proposed to be installed on Mountpleasant Avenue Lower.
- Following the implementation of the Proposed Scheme, it will no longer be possible to turn from Richmond Hill to Mountpleasant Avenue Upper or from Mountpleasant Avenue Upper onto Richmond Hill”. This is incorrect.
- The information in relation to the proposed changes on Mountpleasant Avenue Upper were displayed only on Mountpleasant Avenue Lower. No notice was displayed on Mountpleasant Avenue Upper itself.
- The proposal makes reference to the draft Masterplan for the Gulistan Depot and the site’s access through Parker Hill (3.7.4.4 Draft Gulistan Masterplan 2021 in Appendix A2.1 Planning report). As far as we understand, this is incorrect as car and construction vehicle access for the site will be entirely via Mountpleasant Avenue Upper and Gulistan Terrace while pedestrian and cycle access will be provided through Mountpleasant, Gulistan Terrace, Parker Hill, Castlewood Terrace and adjacent to the Town Hall. This will be an important scheme to enhance permeability for pedestrians and cyclists between the neighbourhoods located to the east of Rathmines Road and the west. It appears that neither the increased car traffic on Mountpleasant Avenue Upper nor the increased pedestrian and cyclists traffic in the area as a result of the Gulistan development has been taken into account in the proposal for Mountpleasant Avenue Upper.

**We ask that An Bord Pleanála refuse the proposed re-opening of Mountpleasant Avenue Upper to vehicular traffic from Richmond Hill due to lack of appropriate public consultation and inaccuracies in the proposal.**

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## CONCLUSION

**To summarise, and with the above safety concerns in mind, we are strongly opposed to the proposed entry for vehicles from Richmond Hill.**

In fact, we believe that due to the strategic importance of this road for pedestrian and cyclist safety, a full closure of the road to vehicular through traffic should be recommended by An Bord Pleanála. As the proposed shuttle system demonstrates, the road’s dimensions make compliance with minimum standards for all users (pedestrians, cyclists and cars) impossible and therefore usage for active and sustainable travel must be prioritised. This is in line with the city’s overall objectives “to prioritise the development of safe and connected walking and cycling facilities and prioritise a shift to active travel for people of all ages and abilities.

**We ask An Bord Pleanála to recommend a review and consultation on the most suitable treatment for the road, including filtered permeability treatment to prioritise pedestrian and cycle traffic. At a minimum the planning approval for the proposed shuttle system needs to be refused and enhancements to footpaths will need to be undertaken to bring those up to required minimum standards.**

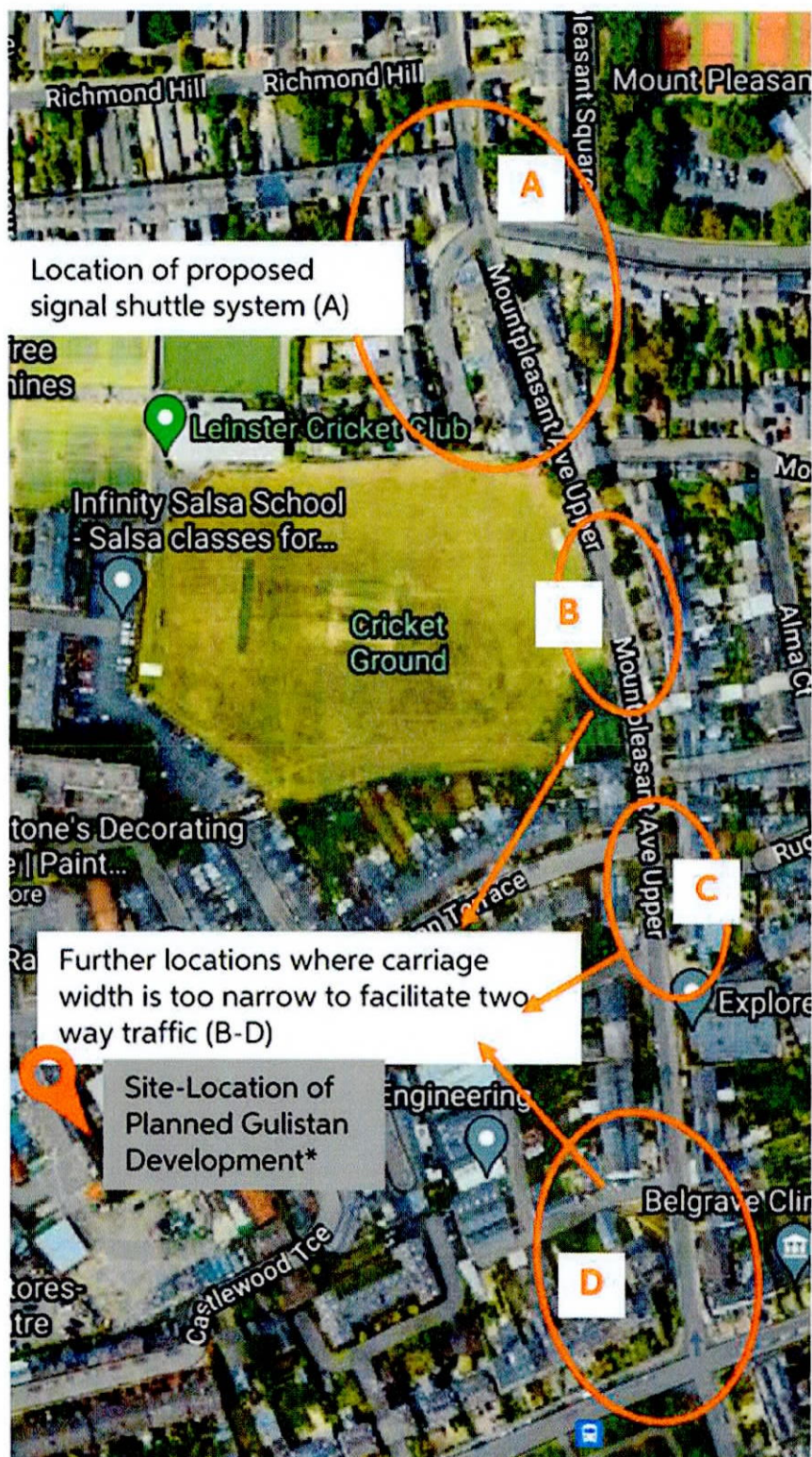
The fee of 50 Euro has been paid.

Yours faithfully,

Claudia Strauss and John Walsh, 7 Mountpleasant Avenue Upper  
Douglas Carson and Rosaleen Crushell, 8 Richmond Place  
Harry Bhoja and Saibh Ni Loingsigh, 51 Mountpleasant Avenue Upper  
Nils Koop and Carol McMahon, 9 Mountpleasant Avenue Upper  
Peter McElwee and Ian Mulvaney, 11 Mountpleasant Avenue Upper  
Jen Sheridan, 35 Gulistan Cottages  
George Jennings & JB Isabelle, 33 Rugby Road  
Ambrose Loughlin and Ben McCabe, 4 Kensington Villas, Upper Mountpleasant Avenue Upper  
Jessica Looney and Eoin Cusack, 9 Gulistan Place  
Breda Corboy, 26 Swan Grove  
Anne Nolan, 2 Gulistan Place  
Barbara Hughes, 22 Mountpleasant Avenue Upper  
Margaret Hall, 20 Gulistan Cottages  
Mary Duffy, 18 Swan Grove  
Helene O'Brien, 20 Gulistan Terrace  
Orla Lane, 50 Mountpleasant Avenue Upper  
Kevin Kline, 16 Gulistan Place  
Tony Cullen, 11 Gulistan Cottages  
Daragh and Sanam O'Shea, 20 Mountpleasant Avenue Upper  
Barbara McAleese, 6 Gulistan Terrace  
Mary Brady, 19 Gulistan Terrace  
Mike and Carrie Guiney, 1 Gulistan Terrance  
Suzanne Black, 18 Gulistan Terrace  
Anne Kearns, 17 Gulistan Terrace  
Ceri and Eoin Flanagan, 26 Mountpleasant Avenue Upper  
Brian Moran and Maree Gallagher, 13 Gulistan Terrace  
Suzanne MacDonald and Antenello Vagge, 3 Gulistan Terrace  
Katy Hanley and Conn McCluskey, 21 Gulistan Terrace  
Stephen & Churpy Fitzgerald, 5 Gulistan Terrace  
John White, 35A Mountpleasant Square  
Grainne Gormley and Curt Adler, 36 Mountpleasant Square



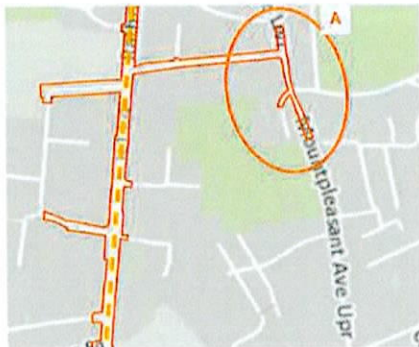
Overview of Mountpleasant Avenue Upper



\* vehicular access solely via Gulistan Terrace and Mountpleasant Ave

**Location A: The location of proposed traffic light shuttle system**

BusConnects map of area:



Location of proposed traffic light # 3 with road dimensions:



(view towards south)



(view towards north)

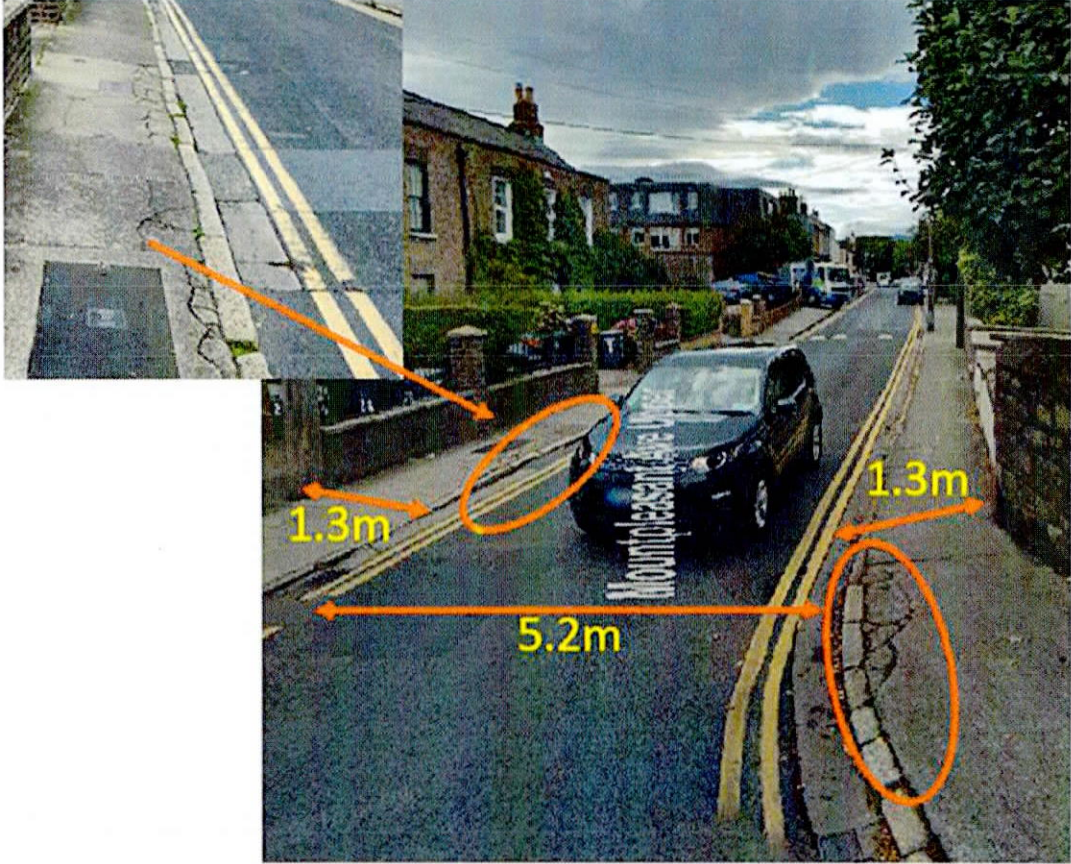
Location of proposed traffic light # 5 with road dimensions:



**Location B : Issue of cars mounting footpaths due to limited carriageway**

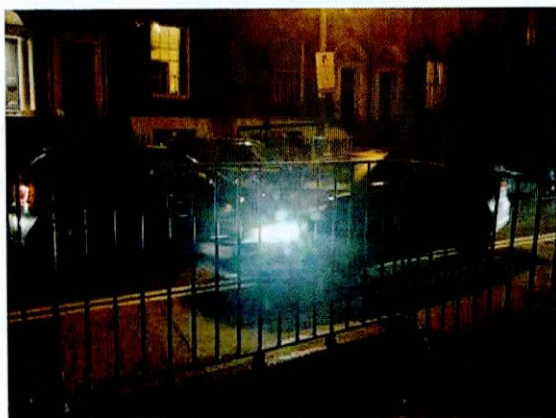


**Location C : Issue of cars mounting footpaths due to limited carriageway**



Cracked footpath due to regular mounting of footpaths by cars

**Location D: Issue of cars mounting footpaths due to limited carriageway and narrow footpaths near Belgrave Square Junction**



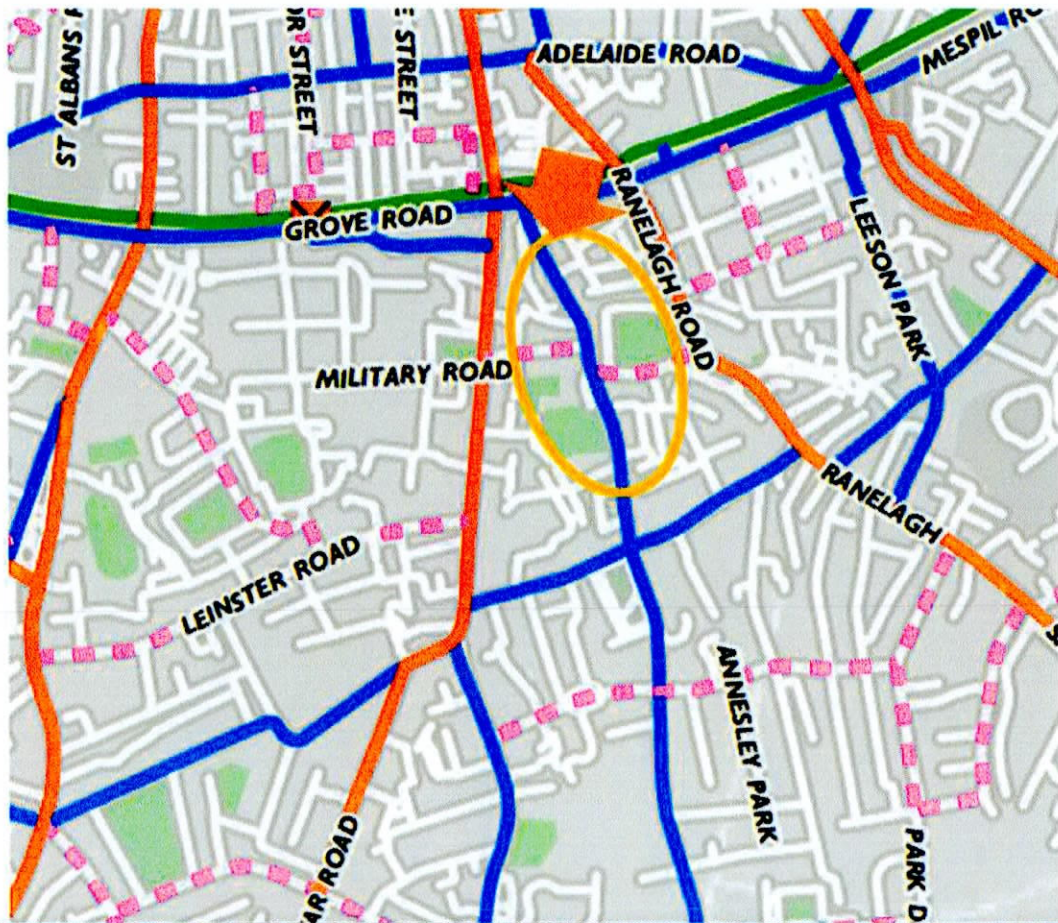
Strategic importance of Mountpleasant Avenue for Pedestrians












### Strategic importance of Mountpleasant Avenue for Cyclists



Extract from GDACNP 2022:



Legend: 	Proposed Crossing Points		Inter Urban
	Primary Radial		Feeder
	Primary Orbital		Greenway - Leisure
	Secondary		Further Study
	Greenway - Utility		